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Document Number:

0096) IV-D-80

Docket Number:

A-90-16

V. G. Beghini
President

A-90-16 7/19/90

IV-D-80

**Marathon
Oil Company**

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July 16, 1990

Mr. William K. Reilly, Administrator
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Re: Docket A-90-16

Dear Mr. Reilly:

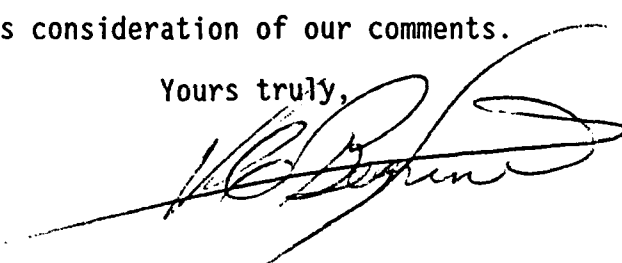
Marathon would like to express its support for Ethyl Corporation's waiver application for HiTEC 3000 and urge that EPA grant the waiver.

We include the following factors among the reasons for our support.

- Ethyl's waiver application shows that a very comprehensive research and testing program for HiTEC 3000 has been completed.
- That testing indicates the additive does not contribute to the failure of automotive emission control systems.
- HiTEC 3000 will help reduce NOx emissions -- a very significant factor in light of pending Clean Air Act legislation and the likelihood that we will be required to reformulate gasoline.
- The additive can be useful in maintaining good octane quality fuels. It, for instance, is useful in adjusting lower octane gasolines to specification with only minimal additional volumes of higher octane hydrocarbon blend stocks.
- HiTEC 3000 appears to be not only technically beneficial, it also is cost effective. That attribute is worthy of notice because cleaning the environment at the lowest possible cost is good for all citizens and consumers.

Marathon appreciates EPA's consideration of our comments.

Yours truly,



VGB:paw

cc: Ms. Mary T. Smith, Director
Field Operations and Support Division